

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ALABAMA  
MOBILE DIVISION**

<b>SOLOMON WILLIAMS</b>	*	<b>CIVIL ACTION NO. 09-0511 KD-M</b>
	*	
	*	
<b>VERSUS</b>	*	<b>JUDGE KRISTI K. DuBOSE</b>
	*	
<b>AET, INC. LIMITED, ET AL</b>	*	<b>MAGISTRATE (1)</b>
	*	<b>BERT W. MILLING, JR.</b>

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**THIRD SUPPLEMENTAL AND AMENDING COMPLAINT**

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN DISTRICT OF ALABAMA, MOBILE DIVISION:

NOW INTO COURT, through undersigned counsel, comes SOLOMON WILLIAMS, who  
moves this Honorable Court to allow him to supplement and amend his original, first, and second  
supplemental complaints as follows.

1.

By adding paragraph 12b to his original complaint to read as follows:

“12b”

Plaintiff avers that this Court has Admiralty and Maritime jurisdiction and alternatively  
pleads his claim under Federal Rule of Civil Procedure 9h.

WHEREFORE, petitioner, reiterating and reaverring each and every allegation of his  
original complaint as though copied at length herein, prays that his original complaint be  
supplemented and amended in the above particulars and that, after all legal delays and due  
proceedings had, there be judgment herein in favor of plaintiff, SOLOMON WILLIAMS, and  
against defendants, AET INC. LIMITED, ROSS MARITIME USA, INC. and ALBATROSS  
MARITIME LLC DBA BERT’S LINE HANDLING, INC. in the full sum of ONE MILLION FIVE

HUNDERED THOUSAND DOLLARS AND NO/100 (\$1,500,000) for all costs of court, for legal interest from the day of judicial demand until paid, for trial by jury, for maintenance, cure, penalties and attorney fees and for other and further relief as in law and equity to which he may be entitled.

Respectfully Submitted,  
/s/ Darleen M. Jacobs  
DARLEEN M. JACOBS, ESQ. - Bar # 7208  
823 ST. LOUIS STREET  
New Orleans, La. 70112  
(504) 522-3287/(504) 522-0155  
ATTORNEY FOR PLAINTIFF,  
SOLOMON WILLIAMS

PLEASE SERVE DEFENDANTS WITH THE ORIGINAL,  
FIRST, SECOND and THIRD SUPPLEMENTAL PETITIONS

AET INC. LIMITED  
Though the attorney of record:  
Delos E. Flint, Jr.  
Anthony D'Alto II.  
400 Poydras Street, 30<sup>th</sup> Floor  
New Orleans, La. 70130

ROSS MARITIME USA, INC.  
Through the Attorney of Record:  
Christopher E. Carey  
Alexander L. Burns  
3 Sanctuary Blvd, Suite 101  
Mandeville, La. 70471

ALBATROSS MARITIME, LLC.  
Through the agent for service of process:  
Carl Black  
1814 Alabama State Docks Blvd  
Mobile Alabama, 36602

BERT'S LINE HANDLING  
Through the agent for service of process:  
Carl Black  
1814 Alabama State Docks Blvd  
Mobile Alabama, 36602

